

1 ROBERT A. MUSIALA, JR. ESQ.  
 2 BAKER & HOSTETLER LLP  
 3 One North Wacker Drive  
 4 Suite 3700  
 5 Chicago, IL 60606  
 6 Telephone: 312.416.6200  
 7 Facsimile: 312.416.6201  
 8 Email: rmusiala@bakerlaw.com

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 10 *Regulatory Counsel for Debtor*

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 13 **UNITED STATES BANKRUPTCY COURT**  
 14  
 15 **DISTRICT OF NEVADA**

16 In re

17 Case No. BK-23-10423-mkn

18  
 19 CASH CLOUD, INC.,  
 20 dba COIN CLOUD,

21 Chapter 11

22 Debtor.

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 28 **BAKER & HOSTETLER'S  
 29 SUPPLEMENT OF ITS FINAL FEE  
 30 APPLICATION FOR SERVICES  
 31 RENDERED AND EXPENSES  
 32 INCURRED FROM APRIL 1, 2023  
 33 THROUGH APRIL 30, 2024**

34  
 35 Hearing Date: October 2, 2024  
 36 Hearing Time: 9:30 a.m.

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 39 Baker & Hostetler LLP ("B&H" or "Applicant"), regulatory counsel to Cash Cloud, Inc.,  
 40 dba Coin Cloud ("Debtor"), debtor and debtor in possession in the above-referenced chapter 11  
 41 bankruptcy case (the "Chapter 11 Case"), respectfully submits the instant *Supplement* (the  
 42 "Supplement") in further support of its *Final Fee Application for Services Rendered and Expenses*  
 43 *Incurred for the Period from April 1, 2023 through April 30, 2024* [ECF No. 1764] (the "Final Fee  
 44 Application"), pursuant to the Retention Order<sup>1</sup> and the Interim Compensation Procedures Order.

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 46 In support of the Final Fee Application, B&H respectfully represents as follows:

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1     **I. THE FINAL FEE APPLICATION**

2         1. On August 30, 2024, B&H filed its Final Fee Application seeking an order allowing  
 3 payment of the full amount of fees and expenses incurred during the period from April 1, 2023  
 4 through April 30, 2024 (the “Final Fee Period”) in the sum of \$202,183.50 in fees and \$511.68 in  
 5 expenses, or a total of \$202,695.18 (the “Requested Compensation”). Of the Requested  
 6 Compensation, B&H received payment of \$50,000.00, with a remaining balance of \$152,695.18.  
 7 B&H submitted its Monthly Fee Statements in this case. No objections to the Monthly Fee  
 8 Statements were filed.

9         2. On September 17, 2024, the undersigned was contacted by the Office of the United  
 10 States Trustee (the “UST”) regarding the Final Fee Application. The UST asserted its position that  
 11 certain of B&H’s fee entries, as more fully discussed below, were either descriptively vague or  
 12 constituted “block billing”.

13         3. In the interest of resolving the concerns raised by the UST, and to obviate the need  
 14 for motion practice before this Court, B&H hereby files the instant Supplement.

15         4. As an initial matter, with regard to certain time entries identified by the UST as  
 16 constituting “block billing”, B&H agrees to voluntary reduce its fee request for those entries in the  
 17 sums identified by the UST, which sum aggregates to \$774.00. Those entries are:

LEDES Row	Date	Timekeeper	Narrative	Objection Amount
16	4/26/23	R. Musiala	Discuss regulatory issues with C McAlary and B Axelrod, review related documentation.	\$162.00
23	4/28/23	R. Musiala	Review FL OFR documentation, discuss with C McAlary and B Axelrod.	\$162.00
65	5/9/23	R. Musiala	Review Florida Office of Financial Regulation materials, discuss with J. Forman and V. Reynolds	\$180.00
111	5/18/23	R. Musiala	Review CKDL Credit LLC contract dispute issues, discuss with A. Noll.	\$108.00
178	6/27/23	R. Musiala	Conduct legal research regarding customer refunds, discuss with B Axelrod and J Tanner.	\$162.00
<b>TOTAL</b>				<b>\$774.00</b>

1       5.     With respect to the time entries identified by the UST as “vague”, B&H submits this  
 2     Supplement for the purpose of providing the necessary detail and information in connection with  
 3     same.

4             • Regarding the time entry in LEDES Row 77 recording time entered on 5/11/23  
 5                 by Jonathan Forman, with narrative reading “Emails with Mr. Musiala, Ms.  
 6                 Reynolds, and Mr. Lamb regarding research”; the narrative should be revised  
 7                 to read **“Emails with Mr. Musiala, Ms. Reynolds, and Mr. Lamb regarding  
 8                 research in support of Coin Cloud's Florida Office of Financial  
 9                 Regulation response.”**

10             • Regarding the time entry in LEDES Row 78 recording time entered on 5/11/23  
 11                 by Veronica Reynolds, with narrative reading “Confer with M. Sabella  
 12                 regarding bankruptcy proceedings”; the narrative should be revised to read  
 13                 **“Confer with M. Sabella regarding letter responding to Florida state on  
 14                 regulatory matter.”**

15             • Regarding the time entry in LEDES Row 134 recording time entered on  
 16                 5/23/23 by Jonathan Forman, with narrative reading “Revise draft response  
 17                 focusing on introduction and legal section”; the narrative should be revised to  
 18                 read **“Revise draft response to Florida Office of Financial Regulation  
 19                 suspension order and administrative complaint focusing on introduction  
 20                 and legal section.”**

21     II.    **CONCLUSION**

22             WHEREFORE, for the reasons set forth herein, the Final Fee Application, and the supporting  
 23     documents in connection with same, B&H respectfully requests (i) that the Court enter an order  
 24     approving, on a final basis, the voluntarily reduced full amount of \$201,409.50 for all professional  
 25     fees for services performed by B&H for or on behalf of Debtor in connection with this Chapter 11

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1 Case as well as expenses incurred in the sum of \$511.68, for a total of \$201,921.18 in Requested  
2 Compensation, and (ii) for such other and further relief as the Court may deem just and proper.

3 Dated this 25th day of September 2024.

4 **BAKER & HOSTETLER LLP**

5 By: /s/ Robert A. Musiala  
6 Robert A. Musiala  
7 One North Wacker Drive  
8 Suite 3700  
9 Chicago, IL 60606  
10 Telephone: 312.416.6200  
11 Facsimile: 312.416.6201  
12 Email: [rmusiala@bakerlaw.com](mailto:rmusiala@bakerlaw.com)  
13 Michael A. Sabella  
14 45 Rockefeller Plaza  
15 New York, NY 10111  
16 (212) 589-4200  
17 [msabella@bakerlaw.com](mailto:msabella@bakerlaw.com)  
18 *Regulatory Counsel for Debtor*

19 Respectfully submitted by:  
20

21 **FOX ROTHSCHILD LLP**

22 By: /s/ Brett A. Axelrod  
23 BRETT A. AXELROD, ESQ.  
24 Nevada Bar No. 5859  
25 1980 Festival Plaza Drive, Suite 700  
26 Las Vegas, Nevada 89135  
27 *Counsel for Debtor*

28  
29 FOX ROTHSCHILD LLP  
30 1980 Festival Plaza Drive, Suite 700  
31 Las Vegas, Nevada 89135  
32 (702) 262-6899  
33 (702) 597-5503 (fax)